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13 *Attorneys for Defendants*

14 *Reed Hein & Associates, LLC dba Timeshare Exit Team,  
15 Brandon Reed, Trevor Hein, Thomas Parenteau, and  
16 Happy Hour Media Group, LLC*

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17 UNITED STATES DISTRICT COURT

18 DISTRICT OF NEVADA

19 DIAMOND RESORTS CORPORATION, a ) Case No.: 2:17-cv-03007-APG-VCF  
20 Maryland corporation, )  
21 Plaintiffs, )  
22 vs. )  
23 REED HEIN & ASSOCIATES, LLC, d/b/a )  
24 TIMESHARE EXIT TEAM, a Washington limited )  
liability company; BRANDON REED, an individual )  
and citizen of the State of Washington; TREVOR )  
HEIN, an individual and citizen of Canada; )  
THOMAS PARENTEAU, an individual and citizen )  
of the State of Washington; HAPPY HOUR MEDIA )  
GROUP, LLC, a Washington limited liability )  
company; MITCHELL REED SUSSMAN, ESQ. )  
d/b/a THE LAW OFFICES OF MITCHELL REED )  
SUSSMAN & ASSOCIATES, an individual citizen )  
of the State of California; SCHROETER, )  
GOLDMARK & BENDER, P.S. A Washington )  
professional services corporation; and KEN B. )  
PRIVETT, ESQ., a citizen of Oklahoma, )  
Defendants. )  
\_\_\_\_\_  
)

25 **STIPULATION AND ORDER  
REGARDING DEADLINE TO  
FILE RESPONSE TO  
PLAINTIFF'S MOTION TO  
COMPEL**

26 **[First Stipulation]**

27 Pursuant to Local Rules IA 6-1, IA 6-2, and 7-1, Plaintiff DIAMOND RESORTS U.S.  
28 COLLECTION DEVELOPMENT, LLC ("Plaintiff") and Defendant REED HEIN &  
ASSOCIATES, LLC d/b/a TIMESHARE EXIT TEAM ("Defendant") (collectively, the

1 "Parties") by and through their respective attorneys of record, hereby jointly stipulate as stated  
2 below.  
3

4 **STIPULATION**

5 1. On July 27, 2020, Plaintiff filed a Motion to Compel Discovery from Reed Hein  
6 & Associates, LLC and For Sanctions (the "Motion"). ECF No. 264.

7 2. The current deadline for response or opposition to the Motion is August 10, 2020.

8 3. In order to adequately address and brief the issues presented in the Motion, the  
9 Parties agree that Defendant's deadline to respond to the Motion be extended an additional four  
10 (4) court days, up to and including August 14, 2020.

11 4. This is the Parties first request for extension of this deadline, and it is not intended  
12 to cause any delay or prejudice to any party. Plaintiff does not object to the requested extension.

13 Dated this 10th day of August, 2020.

14 **GREENSPOON MARDER, LLP**

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20 22 Attorneys for Defendants  
Reed Hein & Associates, LLC dba Timeshare  
Exit Team, Brandon Reed, Trevor Hein,  
Thomas Parenteau, and Happy Hour Media  
Group, LLC

23 **ORDER**

24 IT IS SO ORDERED.  
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26

27 **UNITED STATES MAGISTRATE JUDGE**

28 DATED: 8-20-2020

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